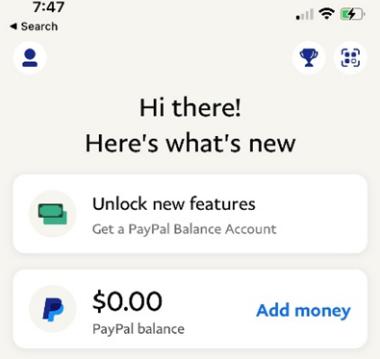


Exhibit B
PayPal Infringement Chart for
U.S. Patent No. 8,538,845

U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
5. A monetary transaction system for conducting monetary transactions between unbanked subscribers and other entities, the system comprising:	<p>Upon information and belief, PayPal manages a transaction system and payment application that allows users to make monetary transactions between parties, including parties that do not have PayPal accounts. The transactions do not need to be linked to a bank account and can consist of cash payments deposited into the account or direct deposits made into the account.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>SEND AND REQUEST MONEY FOR FREE</p> <ul style="list-style-type: none"> • When funded by a bank account or with your <u>PayPal balance</u>, it's free and secure to send money or ask for it back from friends and family in the US. • Just type a name, email or phone number and PayPal will find the right person for you if they have an account. • Request money quickly and securely from friends or family and personalize your payments with animations, stickers, emojis and more. </div> <p>See https://apps.apple.com/app/id283646709?mt=8 (last accessed on February 25, 2022).</p>

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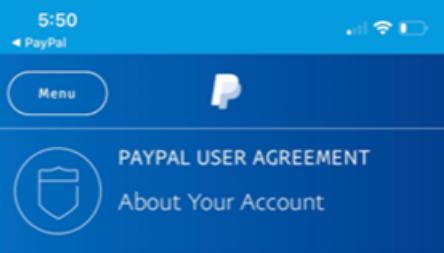
U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	 <p>7:47</p> <p>Hi there! Here's what's new</p> <p>Unlock new features Get a PayPal Balance Account</p> <p>\$0.00 Add money PayPal balance</p> <p>Send money</p> <p>Send money worldwide</p> <p>Send Request</p> <p>See Screenshot of PayPal Mobile Balance Account showing zero balance.</p>

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<p>7:55 </p> <p>← Direct Deposit</p>  <p>Get paid up to 2 days* before payday</p> <p>With Direct Deposit, your money goes right to your PayPal balance. Use it to shop, spend, or get a head start on bills.</p> <p><a data-bbox="650 768 741 788" href="#">Get Started</p> <p>* How it works</p> <p>Early access depends on when we get payment instructions from the payer. When we get them before the scheduled payment date, your money can be made available up to 2 days sooner. Availability and timing can vary based on the payer and when we get payment instructions.</p> <p>To use Direct Deposit and keep money in your PayPal balance, we need to set you up with a PayPal Balance account. It's easy and there's no fee to set it up.</p> <p>It can take up to 2 pay cycles for Direct Deposit</p> <p><i>See Screenshot of PayPal Mobile Balance Account with option to directly deposit wages etc. into the account.</i></p>

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U.S. Patent No. 8,538,845 (Claim 5)

Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	 <ul style="list-style-type: none"> Make payments using your credit card, debit card, bank account, or other payment options, including funds held as balance in a business PayPal account (if we have verified the required identifying information you provide to us) or funds held in a PayPal Balance account linked to a personal PayPal account if you choose to open a PayPal Balance account. The terms “PayPal Balance account” or “Balance Account” in this user agreement are used to refer to a PayPal Balance account and shall include any account currently or previously known as a PayPal Cash or a PayPal Cash Plus account, as applicable. More information about Balance Accounts can be found in the PayPal Balance Terms and Conditions. Accept credit card, debit card, bank account, Balance Account, and other payment methods from others. <p>You are responsible for maintaining adequate security and control of any and all IDs, passwords, personal identification numbers, or any other codes that you use to access your PayPal account and the PayPal services. You must keep your mailing address, email address and other contact information current in</p> <p>paypal.com — Private</p> <p><i>See PayPal User Agreement on PayPal Mobile App identifying both business and private PayPal balance accounts.</i></p>

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U.S. Patent No. 8,538,845 (Claim 5)

Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<p>Money sent by someone else to your personal PayPal account will automatically be placed in your Balance Account.</p> <p>To receive money in a currency your Balance Account is not currently configured to accept, it may be necessary to create a balance in your Balance Account in that currency or convert the money into another currency. Certain currencies can only be received by converting the money into another currency that PayPal allows you to hold. If the money is converted, PayPal's transaction exchange rate (including our currency conversion spread) will be used.</p> <p>You can load funds into your Balance Account at retail stores or you can load funds into it using the remote check capture feature. Fees associated with in-store cash reload and some remote check capture transactions can be found in the PayPal Balance Long Form Disclosure.</p> <p>You may arrange to have all or part of your paycheck or any federal or state government benefit or payment (e.g., Federal tax refunds or Social Security payment) transferred directly into your Balance Account by your employer or government payer, as applicable, by using the Direct Deposit feature.</p> <p>To enroll, you will need to provide your employer or the government payer, as applicable, with the account and routing numbers found in the Direct Deposit section available in the PayPal app. Your employer or government payer may also ask you to fill out their own direct deposit form. We do not charge any fees to set up or maintain Direct Deposit.</p> <p>See https://www.paypal.com/us/webapps/mpp/ua/useragreement-full (last accessed on February 25, 2022).</p> <div data-bbox="502 975 1516 1155" style="border: 1px solid black; padding: 10px;"> <h2>About Payment Methods</h2> <p>PayPal allows you to make payments using a variety of methods including: PayPal balance, a bank account, PayPal Credit, debit or credit cards, and rewards balance.</p> <p>This page does not address unauthorized transactions. For information on your protection against unauthorized transactions, please see the Error Resolution section of the PayPal User Agreement.</p> </div> <p>See https://www.paypal.com/us/webapps/mpp/popup/about-payment-methods (last accessed on February 25, 2022).</p>

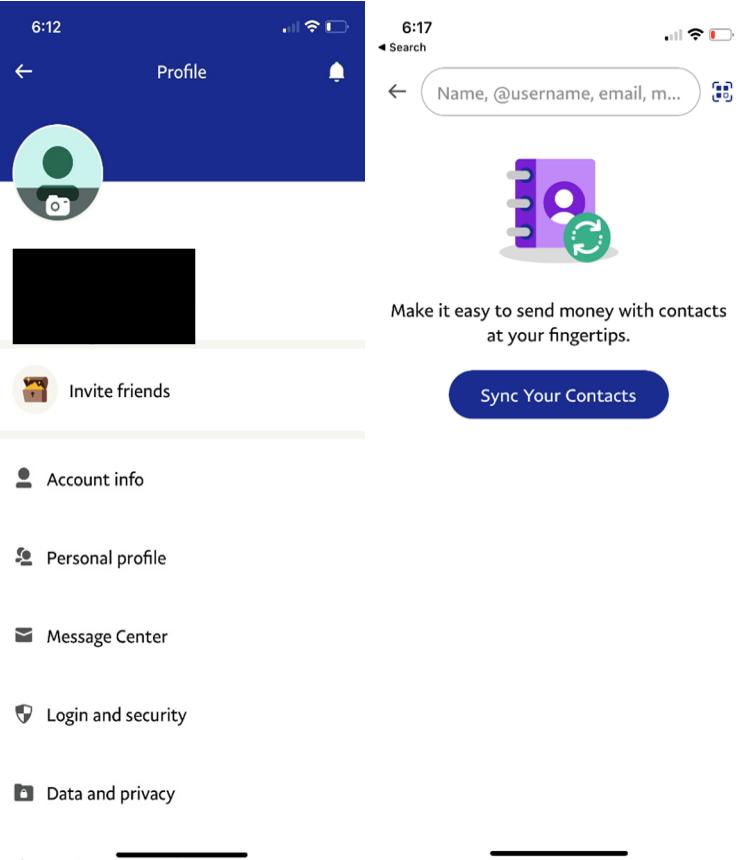
PRIVILEGED AND CONFIDENTIAL
ATTORNEY'S WORK PRODUCT

U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<p>How do I send a payment using my PayPal balance?</p> <p>Payments are automatically made using your PayPal balance first if the currency of your payment is the same as the one of your balance. To send a payment:</p> <ol style="list-style-type: none">1. Click Send and Request at the top of the page.2. Click Pay for goods or services.3. Enter the recipient's email address, and click Next.4. Enter the amount you want to send, and click Continue.5. Review your payment information, and click Send Payment Now. <p><i>See https://www.paypal.com/bs/smarthelp/article/how-do-i-send-a-payment-using-my-paypal-balance-faq1844 (last accessed on February 25, 2022).</i></p>

PRIVILEGED AND CONFIDENTIAL
ATTORNEY'S WORK PRODUCT

U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<p style="text-align: center;">X</p>  <p>Send money directly to friends and family who don't use PayPal</p> <p>By continuing, you agree to the Xoom User Agreement and PayPal Privacy Statement. We'll use your PayPal details to create a personal Xoom account. Look out for an email with more info about Xoom.</p> <p style="text-align: center;">Agree and Continue</p> <hr/> <p><i>See Screenshot PayPal Mobile Application identifying Xoom service.</i></p>
1[a] a mobile device configured to run a monetary transaction system application;	Upon information and belief, the PayPal System uses a mobile device loaded with the PayPal application that can be obtained through third party application stores. The application stores allow end users to download the PayPal application and perform monetary transactions through the PayPal System. On information and belief, the PayPal user and/or PayPal facilitates and derives the beneficial use of the claimed system. <i>See Claim 5 preamble.</i>

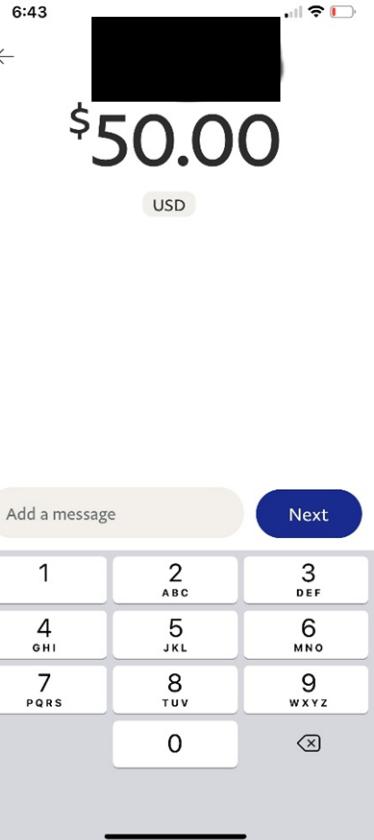
PRIVILEGED AND CONFIDENTIAL
ATTORNEY'S WORK PRODUCT

U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
1[b] a monetary transaction system subscriber that has a profile with the monetary transaction system, wherein the subscriber indicates, via the monetary transaction system application, one or more specified transactions that are to be performed using the monetary transaction system; a monetary transaction system processor that performs the one or more transactions specified by the subscriber, wherein performing the specified transactions includes communicating with a monetary	Upon information and belief, the PayPal system allows users to create a profile and perform transactions using the PayPal System.  <p>The image contains two screenshots of the PayPal mobile application. The left screenshot shows the 'Profile' screen at 6:12, featuring a user's profile picture, a camera icon, and a 'Profile' button. Below the profile picture is a large black redacted area. To the right are buttons for 'Invite friends', 'Account info', 'Personal profile', 'Message Center', 'Login and security', and 'Data and privacy'. The right screenshot shows the 'Search' screen at 6:17, with a search bar containing placeholder text 'Name, @username, email, m...'. Below the search bar is a purple contact card icon with a green circular refresh icon. Text at the bottom of this screen reads 'Make it easy to send money with contacts at your fingertips.' A blue button labeled 'Sync Your Contacts' is located at the bottom right of the search screen.</p> <p><i>See Screenshots of PayPal Mobile app showing personal profile screen and contact screen for initiating mobile transactions. See also Preamble.</i></p>

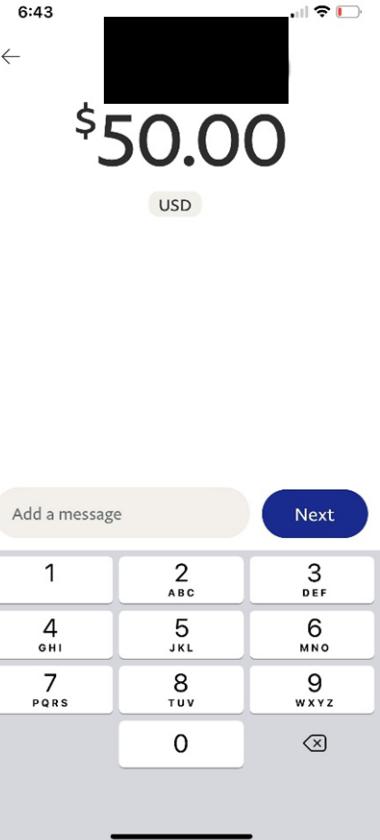
PRIVILEGED AND CONFIDENTIAL
ATTORNEY'S WORK PRODUCT

U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
transaction database to determine whether the transaction is permissible based on data indicated in the subscriber's profile;	
1[c] at least one entity that is to be involved in the specified transaction, the at least one entity having a profile with the monetary transaction system; and	<p>Upon information and belief, the PayPal system allows users to create a profile and perform transactions using the PayPal System. The users can make transactions if one user has a PayPal profile.</p> <p><i>See Preamble and element 1[b].</i></p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>SEND AND REQUEST MONEY FOR FREE</p> <ul style="list-style-type: none"> • When funded by a bank account or with your PayPal balance, it's free and secure to send money or ask for it back from friends and family in the US. • Just type a name, email or phone number and PayPal will find the right person for you if they have an account. • Request money quickly and securely from friends or family and personalize your payments with animations, stickers, emojis and more. </div> <p><i>See https://apps.apple.com/app/id283646709?mt=8 (last accessed on February 25, 2022).</i></p>
1[d] wherein the monetary transaction system is implemented to	Upon information and belief, the PayPal System allows users to transfer money between mobile wallets.

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U.S. Patent No. 8,538,845 (Claim 5)													
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)												
transfer money between mobile wallets, including performing the following steps:	<p>6:43</p>  <p>\$50.00</p> <p>USD</p> <p>Add a message</p> <p>Next</p> <table border="1"> <tr><td>1</td><td>2 ABC</td><td>3 DEF</td></tr> <tr><td>4 GHI</td><td>5 JKL</td><td>6 MNO</td></tr> <tr><td>7 PQRS</td><td>8 TUV</td><td>9 WXYZ</td></tr> <tr><td colspan="2">0</td><td>✖</td></tr> </table>	1	2 ABC	3 DEF	4 GHI	5 JKL	6 MNO	7 PQRS	8 TUV	9 WXYZ	0		✖
1	2 ABC	3 DEF											
4 GHI	5 JKL	6 MNO											
7 PQRS	8 TUV	9 WXYZ											
0		✖											
1[e] receiving subscriber communication	Upon information and belief, the PayPal System, including the backend system receives a notification from the user indicating a desire to transfer funds to a payment recipient. The notification indicates an amount and the payment method to be used.												

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
over one of a plurality of channels connected to the monetary transaction system, the subscriber communication indicating that an unbanked subscriber desires to transfer a specified amount of funds to specified recipient using a specified payment method from the subscriber's mobile wallet;	<p>6:43</p>  <p><i>See Screenshot of PayPal Mobile Application identifying specified amount of funds to be transferred.</i></p>

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<h1>About Payment Methods</h1> <p>PayPal allows you to make payments using a variety of methods including: PayPal balance, a bank account, PayPal Credit, debit or credit cards, and rewards balance.</p> <p>This page does not address unauthorized transactions. For information on your protection against unauthorized transactions, please see the Error Resolution section of the PayPal User Agreement.</p> <p>See https://www.paypal.com/us/webapps/mpp/popup/about-payment-methods (last accessed on February 25, 2022).</p>
1[f], 1[g], and 1[h] validating the status of the selected payment method; performing at least one of a limit check and a velocity check on the selected payment method, the limit check determining whether sufficient funds are available to make the deposit	<p>Upon information and belief, the PayPal System, checks the status of the selected payment method. For example, the PayPal system checks to determine whether the payment method can be used.</p> <h2>How do I send a payment using my PayPal balance?</h2> <p>Payments are automatically made using your PayPal balance first if the currency of your payment is the same as the one of your balance. To send a payment:</p> <ol style="list-style-type: none"> 1. Click Send and Request at the top of the page. 2. Click Pay for goods or services. 3. Enter the recipient's email address, and click Next. 4. Enter the amount you want to send, and click Continue. 5. Review your payment information, and click Send Payment Now.

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
amount, the velocity check determining whether the unbanked subscriber has exceeded a specified number of transactions within a specified time period; validating the status of the specified recipient to ensure the specified recipient has a valid mobile wallet account;	<p><i>See https://www.paypal.com/bs/smarthelp/article/how-do-i-send-a-payment-using-my-paypal-balance-faq1844</i> (last accessed on February 25, 2022).</p> <p>Upon information and belief, the PayPal System also performs a limit check to determine if there are sufficient available funds in the balance account to complete a transaction.</p> <p>Upon information and belief, the PayPal system also performs velocity check, including to identify fraud, to address regulatory requirements, or filter for transaction issues.</p> <p>Upon information and belief, the PayPal System includes velocity checks. These checks for example, monitor the number of transactions the user receive by minute, hour, etc. and the IP addresses of the user’s customers. PayPal’s Fraud Protection Services in the PayPal System include velocity checks along with many other filters to help assist in preventing fraud.</p> <p>Account number velocity filter</p> <p>The account number velocity filter is triggered for excessive use of a card within a short period of time.</p> <p>What does the filter do?</p> <p>The account number velocity filter triggers when any credit card account number is used five times within a three-day (72-hour) period.</p> <p><i>See e.g. https://developer.paypal.com/api/nvp-soap/payflow/fraud-protection/</i> (showing velocity functionality) (last accessed on February 25, 2022).</p> <p>Upon information and belief, the PayPal system includes functionality to further determine that the mobile wallet application is a valid account and is associated with the correct user.</p> <p><i>See e.g. https://developer.paypal.com/api/nvp-soap/payflow/fraud-protection/</i> (showing validating functionality) (last accessed on February 25, 2022).</p>

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<p>Why are limitations placed on an account?</p> <p>There can be several reasons for an account limitation:</p> <ul style="list-style-type: none"> • <i>An unauthorized person may be using your account.</i> If PayPal believes someone is using your account without your knowledge, the account could be limited to protect you from fraudulent charges while PayPal investigates the suspicious transactions. Similar steps may be taken if your debit or credit card issuer or bank notifies PayPal that someone has used your card or bank account without permission. • <i>The account is out of compliance with regulatory requirements.</i> Limitations can also be placed on an account that has been found to be out of compliance with regulatory requirements. For example, if you receive donations, you're required to provide documents confirming you're a registered nonprofit organization. PayPal may limit your account while you gather those documents or while we're working with you to satisfy any other regulatory requirements. The same is true if you don't follow PayPal's Acceptable Use Policy—selling banned items, such as prescription drugs or guns, for example. • <i>Your account has a high number of claims and chargebacks.</i> When there's a high number of buyer claims and chargebacks to your account, we may review your account. While we're reviewing, you may experience an account limitation. • <i>Sudden, rapid changes in what or how much you sell.</i> If you start to sell an entirely new type of product, specifically higher-end items like jewelry; or there's a rapid increase in sales volume, your account may be limited while PayPal reviews it. <p>See https://www.paypal.com/us/brc/article/understanding-account-limitations (last accessed on February 25, 2022).</p>

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
1[i], 1[j], and 1[k] debiting the specified payment method by the specified amount of funds; transferring the specified amount of funds to the specified recipient over at least one of the plurality of channels connected to the monetary transaction system; notifying the unbanked subscriber that the specified amount of funds was transferred to the specified recipient over at least one of the plurality of channels connected to the monetary transaction system.	<p>Upon information and belief, the PayPal System, checks the status of the selected payment method. For example, the PayPal system checks to determine whether the payment method can be used.</p> <h2>About Payment Methods</h2> <p>PayPal allows you to make payments using a variety of methods including: <u>PayPal balance</u>, a bank account, PayPal Credit, debit or credit cards, and rewards balance.</p> <p>This page does not address unauthorized transactions. For information on your protection against unauthorized transactions, please see the Error Resolution section of the PayPal User Agreement.</p> <p>See https://www.paypal.com/us/webapps/mpp/popup/about-payment-methods (last accessed on February 25, 2022).</p>

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U.S. Patent No. 8,538,845 (Claim 5)

Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	A screenshot of a mobile application interface. At the top, the time is 6:43 and there are signal, Wi-Fi, and battery icons. Below the header, there is a large black rectangular redaction box. Underneath the redaction, the amount '\$50.00' is displayed in large black text, with 'USD' in smaller text below it. At the bottom of the screen is a numeric keypad with a grid of buttons. The buttons are labeled as follows: Row 1: '1', '2 ABC', '3 DEF'; Row 2: '4 GHI', '5 JKL', '6 MNO'; Row 3: '7 PQRS', '8 TUV', '9 WXYZ'; Row 4: '0', '*', '#'. Above the keypad, there is a text input field with the placeholder 'Add a message' and a blue 'Next' button to its right. The entire screenshot is framed by a thin black border.

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U.S. Patent No. 8,538,845 (Claim 5)	
Claims	Accused Instrumentalities –PayPal Application and Backend System (“PayPal System”)
	<p><i>See Screenshot of PayPal Mobile Application identifying specified amount of funds to be transferred.</i></p> <p>8:02</p> <p>You sent \$5.00 to [REDACTED] [REDACTED] Tell us how this transaction went</p> <p>Done</p> <p>Send More</p> <hr/> <p><i>See Screenshot of PayPal Mobile Application confirming notification of payment to second entity.</i></p>